

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA, PITTSBURGH DIVISION**

ALEXANDRA R. TRUNZO and ANTHONY	)	
HILISTA, individually and on behalf of other	)	
similarly situated former and current	)	
homeowners in Pennsylvania,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:11-cv-01124
	)	
CITIMORTGAGE, a mortgage servicer; LBPS,	)	Judge Hornak
a mortgage servicer; and PHELAN,	)	
HALLMAN & SCHMEIG, LLP, a law firm	)	
and debt collector,	)	
	)	
Defendants.	)	

**CITIMORTGAGE, INC.'S MOTION TO STRIKE CLASS ALLEGATIONS**

Pursuant to Rule 23(d)(1)(D) of the Federal Rules of Civil Procedure, and for the reasons set forth in the Memorandum of Law in Support of CitiMortgage, Inc.'s Motion to Strike Class Allegations, which is incorporated herein by reference, CitiMortgage, Inc. respectfully requests that the Court strike all class allegations in the Amended Class Action Complaint with respect to CitiMortgage, Inc.

Dated: July 19, 2012

Respectfully submitted,

CITIMORTGAGE, INC.

By: /s/ Thomas R. Johnson  
Thomas R. Johnson  
[tom.johnson@klgates.com](mailto:tom.johnson@klgates.com)  
Samantha L. Brutout  
[samantha.brutout@klgates.com](mailto:samantha.brutout@klgates.com)  
K & L Gates LLP  
K & L Gates Center  
210 Sixth Avenue

Pittsburgh, PA 15222-2613  
Telephone: (412) 355-6488  
Facsimile: (412)355-6501

Debra Bogo-Ernst (admitted *pro hac vice*)  
dernst@mayerbrown.com  
Lucia Nale (*pro hac* application forthcoming)  
lnale@mayerbrown.com  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 782-0600  
Facsimile: (312) 701-7711

*Attorneys for Defendant CitiMortgage, Inc.*